

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:	Chapter 11
RELATIVITY MEDIA, LLC, <i>et al.</i> , ¹	Case No. 18-11358 (MEW)
Debtors.	(Jointly Administered)

**NOTICE OF FILING OF SECOND AMENDED PLAN AND RELATED
DISCLOSURE STATEMENT**

PLEASE TAKE NOTICE that on October 22, 2018, the above-captioned debtors (the “**Debtors**”) filed the *Debtors’ and the Creditors’ Committee’s Joint Liquidating Plan Under Chapter 11 of the Bankruptcy Code* [Docket No. 563] (the “**Original Plan**”).

PLEASE TAKE FURTHER NOTICE that on October 26, 2018, the Debtors filed (a) the *Disclosure Statement for Debtors’ and the Creditors’ Committee’s Joint Liquidating Plan Under Chapter 11 of the Bankruptcy Code* [Docket No. 571], which also attached a copy of the Original Plan as Exhibit A to the Disclosure Statement, and (b) the *Debtors’ Motion for Entry of an Order (I) Approving the Adequacy of the Disclosure Statement, (II) Approving the Solicitation and Notice Procedures with Respect to Confirmation of Debtors’ and the Creditors’ Committee’s Joint Plan of Liquidation, and (III) Approving the Forms of Ballots and Notices in Connection Therewith, (IV) Scheduling Certain Dates with Respect Thereto and (V) Granting Related Relief* [Docket No. 572] (the “**Disclosure Statement Motion**”).

PLEASE TAKE FURTHER NOTICE that on November 28, 2018, the Debtors filed the *Notice of Filing of First Amended Plan and Related Disclosure Statement* [Docket No. 617], which contained the *Debtors’ and the Creditors’ Committee’s First Amended Joint Liquidating Plan Under Chapter 11 of the Bankruptcy Code* (the “**First Amended Plan**”) and the *Disclosure Statement for Debtors’ and the Creditors’ Committee’s First Amended Joint Liquidating Plan Under Chapter 11 of the Bankruptcy Code* (“**First Amended Disclosure Statement**”).

PLEASE TAKE FURTHER NOTICE that a hearing on the Disclosure Statement Motion took place on November 29, 2018 at 11:00 AM (Eastern Time) before the Honorable Michael E. Wiles in Courtroom 617, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004 (the “**Disclosure Statement**”

¹ Each of the Debtors in the above-captioned jointly administered chapter 11 cases and their respective tax identification numbers are set forth (a) in the *Order (A) Authorizing the Joint Administration of their Chapter 11 Cases and (B) Waiving Requirements of Section 342(C)(1) of the Bankruptcy Code and Bankruptcy Rule 2002(n)* [Docket No. 5] and (b) at <https://cases.primeclerk.com/relativity>. The location of Relativity Media, LLC’s corporate headquarters and the Debtors’ service address is: 9242 Beverly Blvd #300, Beverly Hills, CA 90210.

Hearing”), in which the Court granted the Disclosure Statement Motion, subject to certain modifications stated on the record.

PLEASE TAKE FURTHER NOTICE that, in connection with the approval of the Disclosure Statement Motion at the Disclosure Statement Hearing, and in further approval of the form and modifications set forth herein, the Debtors (a) have filed the *Debtors’ and the Creditors’ Committee’s Second Amended Joint Liquidating Plan Under Chapter 11 of the Bankruptcy Code* [Docket No. 633] (the “**Second Amended Plan**”) and, by this notice, hereby file a blackline noting the changes from the First Amended Plan attached to this notice as **Exhibit A**, and (b) have filed the *Disclosure Statement for Debtors’ and the Creditors’ Committee’s Second Amended Joint Liquidating Plan Under Chapter 11 of the Bankruptcy Code* [Docket No. 634] (the “**Second Amended Disclosure Statement**”) and, by this notice, hereby file a blackline noting the changes from the First Amended Disclosure Statement attached to this notice as **Exhibit B**. To avoid duplication, no exhibits are appended to the blacklines of either the Second Amended Plan and Second Amended Disclosure Statement.

PLEASE TAKE FURTHER NOTICE that copies of each pleading identified herein can be viewed on the Court’s website at www.nysb.uscourts.gov and the website of the Debtors’ proposed notice and claims agent, Prime Clerk LLC, at <https://cases.primeclerk.com/relativity>.

Dated: December 13, 2018
New York, NY

WINSTON & STRAWN LLP

By: /s/ Carrie V. Hardman

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